

EXHIBIT A

REQUEST TO CHARGE

Limiting Instruction – Similar Act Evidence

The government has offered evidence that on different occasions the defendant allegedly engaged in criminal conduct that is not charged in this case. Specifically, you have heard evidence regarding an alleged scheme related to a university in Oregon, and a hospital in Missouri. Let me remind you that the defendant is not on trial for committing acts which are not charged in the indictment. Accordingly, you may not consider evidence of the University and Hospital schemes as a substitute for proof that the defendant committed the charged scheme. Nor may you consider evidence of the University and Hospital schemes as proof that the defendant has a propensity to commit crimes or has a bad moral character and therefore committed the charged scheme. The evidence of the University and Hospital schemes was admitted for a much more limited purpose. It was admitted only to help you decide the defendant's knowledge, intent, identity, absence of mistake, or lack of accident with respect to the charged scheme.

Evidence of other acts may not be considered by you for any other purpose. Specifically, you may not use this evidence to conclude that because the defendant may have committed other acts he must also have committed the acts charged in the indictment.